

In the Matter of)	
)	
Service Rules For The Point-To-Point)	RM-10288
Use Of The 71.0-76.0 GHz)	
and 81.0-86.0 GHz Bands)	

¹Report No. 2504 (September 27, 2001).

the Industrial/Business Radio Service, the 800 and 900 MHz Business and Special Industrial/Land Transportation Pools, 800 MHz General Category frequencies, and for the 929 MHz paging frequencies.

In this proceeding, LOEA Communications Corporation (“LOEA”), has proposed that the Commission create a frequency allocation for the 71.0-76.0 GHz and 81.0-86.0 GHz bands for a wireless broadband service that promises gigabit-per-second transfer speeds utilizing pencil-sized beams. LOEA proposes that users be licensed by the Commission, and that a coordination process be implemented to assure that systems utilizing the entire allocated bandwidth do not interfere with one another.

II. COMMENTS

As the wireless trade association dedicated to accelerating mobile convergence, PCIA supports LOEA’s entrepreneurial and innovative efforts to further point-to-point communications. By increasing options for wireless internet access, LOEA’s proposed system has the potential to help accelerate the m-convergence revolution.

1. Allocation Methodology

LOEA requests that the Commission refrain from imposing auctions on the new allocation. PCIA agrees that auctions are inappropriate for the proposed service, and could actually lead to spectrum inefficiencies. Specifically, the Commission typically auctions spectrum based upon geographic divisions that generally follow political or trade boundaries. However, the proposed service can be utilized by many users within the same geographic area through a slight shift in antenna alignment. Thus, allocating the entire band to a single licensee in a Basic Economic Area (for example) would yield tremendous inefficiencies.

Because users can share the same geographic space, the proposed allocation is very similar to the 150 MHz and 450 MHz Part 90 private radio bands, where literally hundreds of users share the same frequency. The Commission decided that allocation of such spectrum via auction would not be efficient.² The same reasoning applies to the new allocation.

2. Licensing

PCIA agrees that the allocation format most suitable for development of this allocation is to have each user licensed. The importance of licensing for new radio services cannot be stressed enough. In order for manufacturers to produce equipment in quantities sufficient to create a reasonably-priced marketplace, manufacturers must have one thing, certainty. That certainty is created by licensing of users and definitive rules.

PCIA believes that the Commission should take all prudent measures to ensure the rapid and wide-spread deployment of this technology. Licensing would create an atmosphere that would bring the most certainty to the manufacturing community. PCIA believes that licenses can be issued with a minimum of administration by the Commission.

Of course, should the Commission elect not to license users, such as with the Wireless Medical Telemetry Service (WMTS), the frequency coordination function becomes even more important. Hence, should the Commission decline to propose and/or implement standard licensing for this band, PCIA believes a registration protocol, similar to the one the FCC currently uses for

²*Implementation Of Sections 309(j) and 337 of the Communications Act of 1934, Report and Order and Further Notice of Proposed Rule Making, WT Docket No. 99-87, FCC 00-403, released November 20, 2000.*

the WMTS, would maximize use of the band while preventing harmful interference between co-channel and adjacent channel operations.

3. Coordination

Because so many users have the potential of using the same geographic space, the most critical element in a successful implementation of the service is the utilization of frequency coordination. Since a slight move in an antenna may result in the creation or elimination of interference, it is vitally important that specific technical information be made available to users.

The utilization of frequency coordination services will also reduce the Commission's licensing burden.³ This is consistent with the Commission's efforts to maximize opportunity and minimize regulation.

By utilizing a central database with technical information regarding placement of directional antennas, users will be able to rapidly and reliably implement service. As an industry leader in frequency coordination and spectrum management, PCIA believes that the implementation of an industry-based database management function for this new service is vital to ensure its success.

³Of course, should the Commission elect to treat this service in a manner similar to the Wireless Medical Telemetry Service, frequency coordination becomes even more important.

III. CONCLUSION

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully Submitted,

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

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